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I will focus here on section 100: "..whether we should make changes to the E-rate program to ensure that supported services are, at a minimum, used for the core purpose of educating students…"

I applaud the effort by the FCC to concentrate resources on benefits to students. I argue that this can only be accomplished by a stronger definition of "educational purposes".

I'm going to put technology in school districts into three categories:

1. Infrastructure: technology needed to connect the district digitally (for example: networking hardware and software)

2. Administrative: technology to maximize the district's efficiency and effectiveness in operations (for example: an online system for teachers to request substitutes)

3. Instructional: technology experienced by students in the course of learning (for example: digital sensors for science experiments)

The key here is in the third definition: experienced by students. Instructional technology must be part of the student's learning process; if only the teachers or administrators or even parents use it, it's not instructional technology. Student information systems are not instructional technology. Phones are not instructional technology. Nor are data warehouses, bus routing systems, or emergency messaging. They are all valuable and necessary, but they are not instructional technology.

[There are admittedly blurry lines here. Are learning management systems instructional technology, if the students access them to get assignments? Is the teacher's laptop, if the teacher uses it to project a lesson? Is the library system, if the students use it for research as well as the librarians for book management? I don't have pat answers, but if these are the fine points to argue, then the discussion is going in the right direction.]

All three of these categories of technology are necessary and important for a modern school district to perform well. All three of these need sustainable sources of funding. E-rate has so far concentrated on the first category, Infrastructure. In the E-rate notice, it appears this will continue to be the focus, but they would like to give preference to infrastructure for "educational purposes". To this end, they can create sub-categories of Infrastructure:

1. Infrastructure for primarily supporting instruction (example: increasing network bandwidth to classrooms)

2. Infrastructure for both administrative and instructional purposes (example: increasing the speed of a district's connection to the internet)

3. Infrastructure for administrative purposes only (example: networking to non-instructional buildings)

If E-rate wants to support "educational purposes", they can prioritize funding in the above order, while allowing applications for all three categories of funding.

I would also support a requirement that districts must use existing state master contracts for IT products and services - without having to go through their own competitive bidding - unless they can demonstrate that they can get the same quality and scope of services for less.